

**BC**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**FILED**

8/28/2024

VKM

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

Changhu Youthskey Import and Export Co.,Ltd	)	Case Number: 1:24-cv-04766
Plaintiff	)	
	)	Judge: Martha M. Pacold
v.	)	
Ebay: buff8855	)	Magistrate Judge: Maria Valdez
Defendant	)	

## Civil Caption Form submittal:

Upon contacting the Deputy Clerk Office in the Northern District Court of Illinois I was instructed on filing these forms in response to the "Summons in a Civil Case" I received on August 22, 2024.

The Complaint is: Changshu Youthskey import and export co. ltd (Plaintiff) against Ebay: buff8855 (Defendant) for offering for sale and/or selling unauthorized and unlicensed counterfeit products, including pillowcases, coverlets, quilt covers and bedding sets, using counterfeit versions of Plaintiff's federally registered trademarks.

In answer to this allegation I am not selling counterfeit products from the Plaintiff. I purchased the product that was sold through Ebay from a retail store in Mississippi. I offered said product (Simple and Opulence 100% Linen Duvet Cover with 2 Satin Basic Grey King New Sealed) \*\*\*see Exhibit 3 via Ebay and it was purchased by: Ya Liu 1519 W. Warren Blvd Unit 501 PMB 171 Chicago, IL 90007. I do not manufacturer nor do I represent myself as being a source for Changhu Youthskey Import and Export Co. Ltd.

Monday, August 26, 2024

Paypal – Legal Team  
2211 N. 1<sup>st</sup> Street  
San Jose, CA 95131

RE: Paypal #buff8855-eBay-4766

Dear Sir/Madam:

I am writing due to a Legal Hold being placed upon my Paypal account by Concord and Sage PC. This action was taken due to a product that we sold (see photos) that they deemed "Infringement Right". We purchased this product in "Good Faith" from a retail establishment and did not have any knowledge that the product was according to them "Protected". I have not received any legal document describing our "Infringement". The last email sent August 20, 2024 claims they want to settle this Legal Action for a \$3,000 remittance. Can you lend any assistance in confirming this is legitimate and/or remove this Legal Hold on my account?

Best Regards,

William & Glenna Buff  
105 Robertson Dr.  
Somerville, TN 38068  
(901) 831 – 9841 cell

 Get Help

## Your account access is temporarily limited

We've received Legal Demand/Order(s) that affect your PayPal account. The order(s) is a legal seizure of property or accounts to satisfy a debt. The order(s) requires us to freeze and/or turn over any funds in your account. If you have any questions or need more information about the order(s), please contact the relevant agency(s).

Some of your account features will be blocked until this matter is resolved.

Reference ID: PP-L-479417682048

Legal Demand/Order(s) received

See Details

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# Legal Demand/Order(s) received

PayPal has received one or more Legal Demand/Order(s) that affect your account. If you have any questions or need more information about the order(s), please contact the relevant agency(s).

**Legal Demand / Order Type :** Temporary  
Restraining Order

**Case Caption :** Changshu Youthskey  
Import and Export  
Co LTD v The  
Partnerships et

**Legal Demand / Order ID :** 24CV04766

**Agency received from :** Concord & Sage

**Contact person :** Qin Li, Esq.

**Contact information :** enforcement@concondsage.com

Legal Hold

Yahoo/Sent 



William Buff

From: w.buff@att.net

To: Enforcement@concondsage.com

Mon, Aug 12 at 5:31 AM 

Good morning.  
I have received notice from my Paypal account that a Legal Hold has been placed upon my account. Can you please explain this action? My Paypal account is under.... glennabuff8855@gmail.com Thank You

## Legal Demand/Order(s) received

PayPal has received one or more Legal Demand/Order(s) that affect your account. If you have any questions or need more information about the order(s), please contact the relevant agency(s).

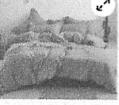
**Legal Demand / Order Type :**  
Temporary  
Restraining Order

**Case Caption :**  
Changshu Youthskey  
Import and Export Co  
LTD v The  
Partnerships et

**Legal Demand / Order ID :**  
24CV04766

**Agency received from :**  
Concord & Sage

**Contact person :**  
Qin Li, Esq.

Item	What your buyer paid
	
Simple & Opulence 100% Linen Duvet Cover with 2 Shams Basic Grey King New Sealed	Item subtotal \$94.50
Quantity 1	Shipping \$0.00
Price \$94.50	Sales tax \$9.69
Total \$94.50	
	Order total \$104.19
<a href="#">See more item specifics</a>	
What you earned	^
Order total \$104.19	
eBay collected from buyer	
Sales tax -\$9.69	
Settling costs	
Transaction fees -\$12.82	
Order earnings \$81.68	
	<a href="#">See more details</a>

----- Forwarded message -----

**From:** [enforcement](mailto:enforcement@concondsage.com) <[enforcement@concondsage.com](mailto:enforcement@concondsage.com)>  
**Date:** Tue, Aug 13, 2024 at 1:30 AM  
**Subject:** Re:Paypal #buff8855-eBay-4766  
**To:** Glenna Buff <[glenabuff8855@gmail.com](mailto:glenabuff8855@gmail.com)>

Hi,

Please find attached evidence of infringement.

Best,

**IP Department**

1360 Valley Vista Dr, Suite 140, Diamond Bar CA 91765

----- Original -----

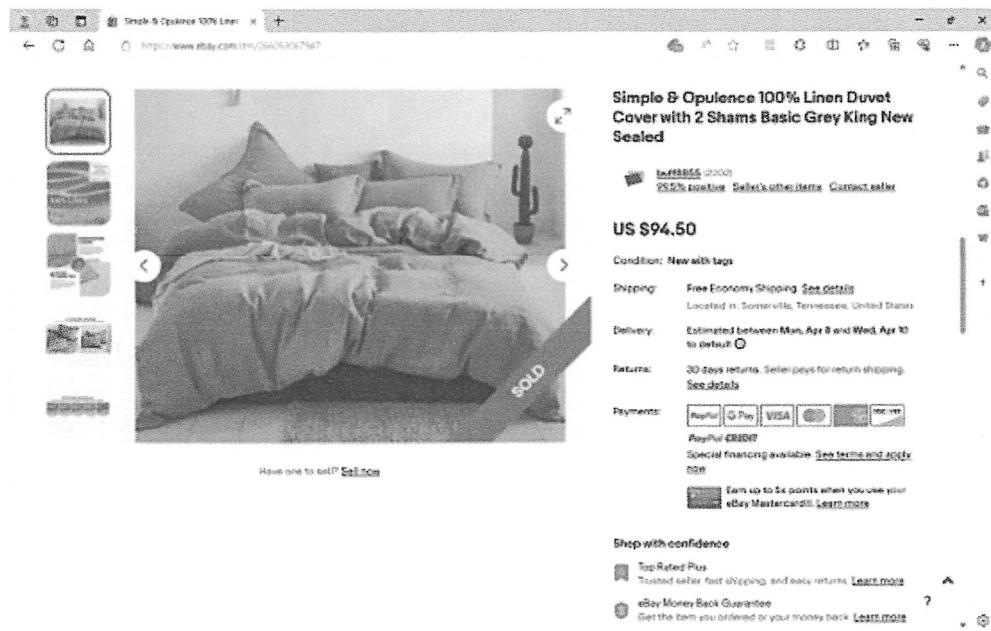
**From:** "Glenna Buff" <[glenabuff8855@gmail.com](mailto:glenabuff8855@gmail.com)>;  
**Date:** Mon, Aug 12, 2024 07:55 AM  
**To:** "enforcement" <[enforcement@concondsage.com](mailto:enforcement@concondsage.com)>;  
**Subject:** Paypal

Legal Hold on Funds due to your contact to Paypal.com Please confirm as to what has caused this Legal Hold on my Paypal account. Thank You

Defendant No.: 15

Store Name: buff8855

Platform: Ebay



Simple & Opulence 100% Linen Duvet Cover with 2 Shams Basic Grey King New Sealed

buff8855 (2200) 99.9% positive Seller's other items Contact seller

US \$94.50

Condition: New with tags

Shipping: Free Economy Shipping See details Located in: Somerville, Tennessee, United States

Delivery: Estimated between Mon, Apr 8 and Wed, Apr 10 to default

Returns: 30 days return. Seller pays for return shipping. See details

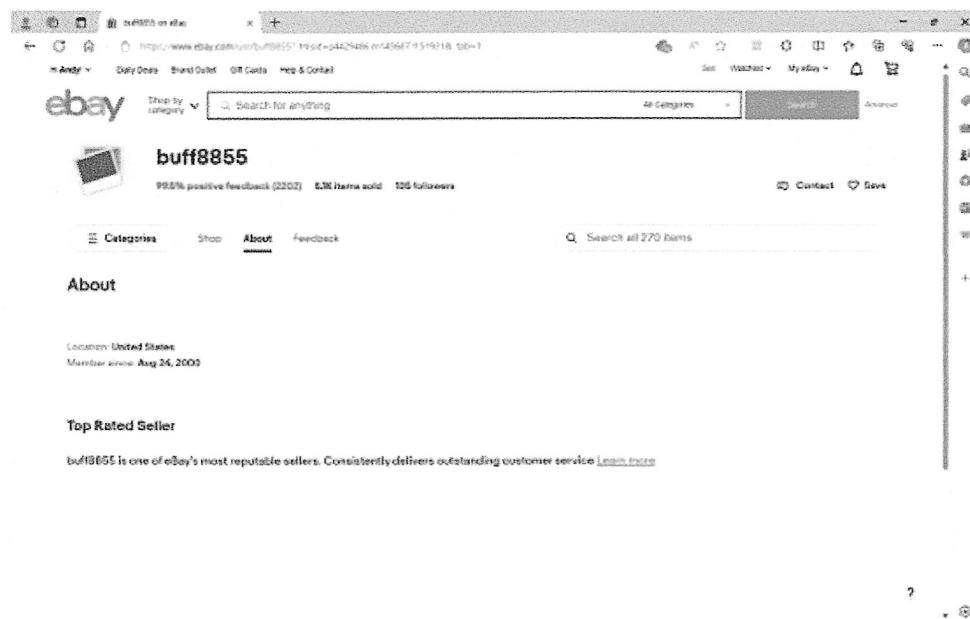
Payments: Special financing available. See terms and apply. See details

Earn up to 5x points when you use your eBay MasterCard! Learn more

Shop with confidence

Top Rated Plus Trusted seller, fast shipping, and easy returns. [Learn more](#)

eBay Money Back Guarantee Get the item you ordered or your money back. [Learn more](#)



buff8855

99.9% positive feedback (2200) 5.3K items sold 125 followers

Categories Shop About Feedback

About

Location: United States Member since: Aug 24, 2003

Top Rated Seller

buff8855 is one of eBay's most reputable sellers. Consistently delivers outstanding customer service. [Learn more](#)

Hi eBay  Daily Deals Brand Outlet Gift Cards Help & Contact

[Sell](#) [Watchlist](#) [My eBay](#) [Notifications](#) 

Shop by category  Search for anything All Categories  Advanced search

## Order details

 [Printer friendly page](#)

Order info		Shipping address	
Time placed	Apr 2, 2024 at 3:00 PM	Yi Lu	1510 W Warren Blvd. Unit 500, PMB 171
Order number	17-11387-7315	Address	Chicago, Illinois 60607-1040
Total	\$104.19 (1 item)	City	United States
Sold by	buff555	State/Zip	

Delivery info			Payment info	
Paid	Apr 2	Shipped	Delivered	VISA Ending in 7708
			Yi Lu Apr 2 at 3:11 PM	
Tracking details			Item	\$94.00
Shipping Service: Economy Shipping			Shipping	Free
			Tax	\$0.00
			Order total	\$104.19

**Item info:**



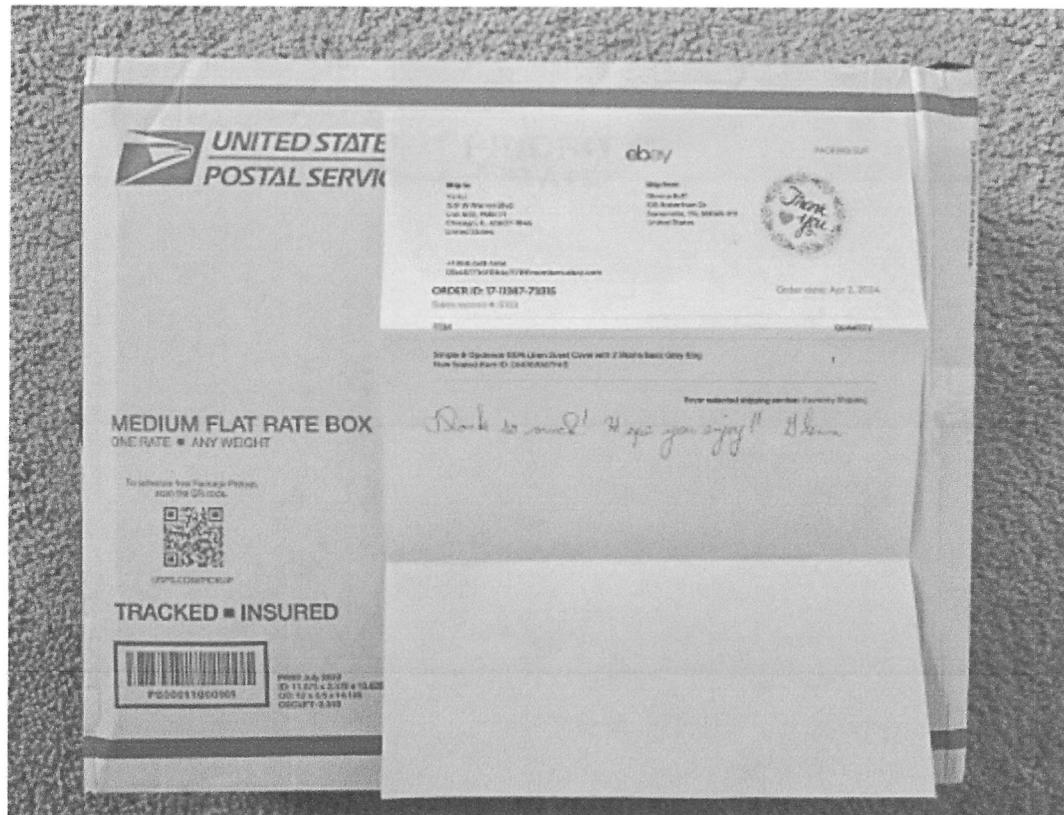
Simple & Opulence 100% Linen Duvet Cover with 2 Shams Basic Grey King New Sealed \$94.50

Item number: 269053067947

Returns accepted through May 8, 2024.

[Contact seller](#) [More actions](#)

How do you like our order details page?  
[Tell us what you think](#)







Glenna Buff

From: glennabuff8855@gmail.com  
To: ICE Husband Bill Buff



Tue, Aug 20 at 11:52 AM

----- Forwarded message -----

From: Glenna Buff <glenabuff8855@gmail.com>  
Date: Tue, Aug 20, 2024, 9:59 AM  
Subject: Re: Paypal #buff8855-eBay-4766  
To: enforcement <enforcement@concondsage.com>

You can't possibly be serious! We have received nothing from you informing us of what you think we did. If you want to take this any further, send all pertinent information for our attorney review and you will, then, receive your answer. This is starting to sound like a scam and I will be reporting it if you can't give us some legal documentation. Glenna

On Tue, Aug 20, 2024 at 9:40 AM enforcement <enforcement@concondsage.com> wrote:

Hi,

My client is willing to settle for \$3000, please advise.

Best,

IP Department



1360 Valley Vista Dr, Suite 140, Diamond Bar CA 91765

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

**SUMMONS IN A CIVIL CASE**

Changshu Youthskey Import and Export Co. Ltd,

CASE NUMBER: 1:24-cv-04766

v.

ASSIGNED JUDGE:

Martha M. Pacold

The Partnerships and Unincorporated  
Associations Identified on Schedule "A"

DESIGNATED

MAGISTRATE JUDGE: Maria Valdez

TO: (Name and address of Defendant)

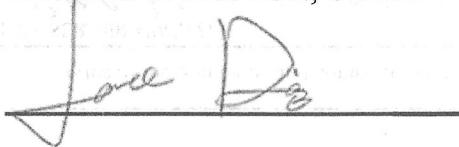
Kingdom Restore and all other Defendants identified in the Complaint

**YOU ARE HEREBY SUMMONED** and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

Concord & Sage PC  
ATTN: Qin Li  
1360 Valley Vista Dr, Ste 140  
Diamond Bar, CA, 91765

an answer to the complaint which is herewith served upon you, 21 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

THOMAS G. BRUTON, CLERK

  
(By) DEPUTY CLERK



August 22, 2024

DATE